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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CHASOM BROWN, MONIQUE
TRUJILLO, WILLIAM BYATT, JEREMY
DAVIS, and CHRISTOPHER CASTILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**JOINT STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME FOR
GOOGLE TO SUBMIT DECLARATION
IN SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER GOOGLE'S
MATERIAL IN PLAINTIFFS' REPLY IN
SUPPORT OF MOTION FOR CLASS
CERTIFICATION SHOULD BE SEALED
(DKT. 712)**

The Honorable Yvonne Gonzalez Rogers

Pursuant to Civil Local Rule 6-2 and 7-12, this joint stipulation is entered into between Plaintiffs and Google LLC (“Google”), collectively referred to as the “Parties.”

WHEREAS, on August 26, 2022, Plaintiffs filed their Administrative Motion to Consider Whether Google’s Material in Plaintiffs’ Reply in Support of Motion for Class Certification Should Be Sealed (“Motion to Seal”) (Dkt. 712);

WHEREAS, on August 26, 2022, Google received unredacted copies of Plaintiffs’ Motion to Seal and exhibits cited in Dkts. 712 and 713;

WHEREAS, pursuant to Civil Local Rule 79-5(e), the deadline for Google, as the Designating Party to portions of Plaintiffs’ Motion to Seal (Dkt. 712), to establish that such designated material is sealable, is Friday, September 2, 2022;

WHEREAS, Google has requested, and Plaintiffs do not oppose, that an extension of time of 14 days to Friday, September 16, 2022 will provide Google with sufficient time to submit its declaration in support of its designated materials in the filings (Dkts. 712 and 713);

NOW THEREFORE, the Parties stipulate to extend the deadline by which Google shall submit a Declaration in support of Plaintiffs’ Motion to Seal (Dkt. 712) to Friday, September 16, 2022.

DATED: August 31, 2022

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

BOIES SCHILLER FLEXNER LLP

/s/ Andrew H. Schapiro

/s/ Mark Mao

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Attorneys for Plaintiffs

ATTESTATION OF CONCURRENCE

I am the ECF user whose ID and password are being used to file this JOINT STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR GOOGLE TO SUBMIT DECLARATION IN SUPPORT OF PLAINTIFFS' ADMINISTRATIVE MOTION TO CONSIDER WHETHER GOOGLE'S MATERIAL IN PLAINTIFFS' REPLY IN SUPPORT OF MOTION FOR CLASS CERTIFICATION SHOULD BE SEALED (DKT. 712). Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in the filing of this document

Dated: August 31, 2022

By /s/ Andrew H. Schapiro

Andrew H. Schapiro

Counsel on behalf of Google

[PROPOSED] ORDER

Pursuant to stipulation of the Parties, the Court hereby **ORDERS:**

The deadline for Google to submit a Declaration in support of Plaintiffs' Administrative Motion to Consider Whether Google's Material in Plaintiffs' Reply in Support of Motion For Class Certification Should Be Sealed (Dkt. 712), shall be extended to September 16, 2022.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____

HON. YVONNE GONZALEZ ROGERS
United States District Judge